

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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CRIMINAL NO. 05-10001-WGY

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UNITED STATES

v.

GREGORY WRIGHT

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**DEFENDANT'S SUPPLEMENTAL MEMORANDUM  
IN SUPPORT OF MOTION TO SUPPRESS**

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The defendant submits the attached article that was published in The Boston Globe in September 2007 to further inform his argument that the circumstances of this case do not warrant the police action in stopping the defendant, even if the Court were to find that Mr. Wright fled in response to his recognition of the police arrival at the mini-mart.

Respectfully submitted,  
**GREGORY R. WRIGHT**  
By his attorneys,

/s/ Charles W. Rankin

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**Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non participants on October 19, 2007.

/s/ Charles W. Rankin

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Charles W. Rankin

# Fla. sheriff targeting immigrant laborers

By Melissa Nelson  
ASSOCIATED PRESS

PANAMA CITY BEACH, Fla. — The Bay County Sheriff's Department has developed a remarkably effective, but contentious way of catching illegal immigrants: Deputies in patrol cars pull up to a construction site in force, and watch and see who runs.

Those who take off are chased down and arrested on charges such as trespassing for cutting through someone else's property, loitering for hiding out in someone's yard, or reckless driving, for speeding off in a car.

US immigration authorities are then given the names of those believed to be in the country illegally.

"It's not wrong for them to run, but it's not wrong for us to chase them either," said Sheriff Frank McKeithen, who created his Illegal Alien Task Force in April to target construction sites that use illegal immigrant laborers in this Florida Panhandle county.

Immigrant advocates say the technique is repugnant, and the American Civil Liberties Union says its constitutionality is questionable.

Illegal immigrants are leaving Panama City Beach. And builders are worried the crackdown will deprive them of the labor they need to take part in a building boom in which cheap spring break motels are being torn down and replaced with high-rise condominiums.

Louis Breland, a developer who is finishing the first phase of a \$750 million beach condo project, said immigrant laborers are the best workers. "Without them, the cost of construction would be 10 times as much and nothing would get built," he said.

The sheriff said the raids are justified under a longstanding Florida law prohibiting employers from knowingly hiring illegal immigrants. His department has conducted dozens of these raids over the past three months and has reported more than 500 people to immigration officials since November.

The Mexican American Legal Defense Fund is investigating the arrests because "the intimidation factor is of great concern," said Elise Shore, regional counsel for the organization.

Benjamin Stevenson, a lawyer with the ACLU in Florida, said he finds the tactic troubling.

Barbara Gonzalez, a spokeswoman for US Immigration and Customs Enforcement in Miami, would not comment on the sheriff's tactics.